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7465 W. Lake Mead Blvd., Suite 100
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10 Telephone: (702) 979-9047
11 *Attorneys for Defendant*

12
13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 RASHAUD BLANDBURG, an Individual,

16 Plaintiff,

17 vs.

18
19 ADVANCED LIGHTING AND
ELECTRIC, INC., DOES I -X; ROE
20 CORPORATIONS I -X.

21
22 Defendant.

CASE NO.: 2:19-cv-01519-RFB-BNW

STIPULATION AND ORDER TO
EXTEND TIME FOR PARTIES TO
SUBMIT JOINT PRETRIAL ORDER
(FIRST REQUEST)

23
24 Plaintiff Rashaud Blandburg (“Plaintiff”), and Defendant Advanced Lighting and
25 Electric, Inc. (“Advanced Lighting”), through their respective attorneys of record, stipulate to,
26 and agree upon, a minor extension of the deadline to submit a joint pretrial order, as follows.

27 On February 3, 2022, Plaintiff filed his Motion for Partial Summary Judgment. [ECF
28 58], which was opposed by Advanced Lighting. Recently, oral argument took place on the

1 matter. Approximately, one month ago, on September 28, 2022, this Court entered its Order
2 denying Plaintiff's Motion for Partial Summary Judgment. [ECF 75].

3 Early last week, Plaintiff's counsel had a family emergency that has prevented her from
4 meeting and conferring with defense counsel in regard to the joint pretrial order. To give the
5 parties sufficient time to meet and confer to finalize the joint pretrial order, the parties hereby
6 stipulate and agree the parties shall have 30 additional days to file their joint pretrial order, such
7 that the new deadline to file the joint pretrial order shall be **November 28, 2022**.

8 Plaintiff's counsel's on-going family emergency similarly delayed approval of this
9 proposed stipulation constituting good cause for the approximately one court day delay in
10 submitting this request.

11 This is the first request to extend the joint pretrial order deadline, and only the third
12 request to extend discovery / case deadlines, and is not made for purposes of undue delay.

13 Dated: November 3, 2022
14

15 HKM EMPLOYMENT ATTORNEYS LLP

LOVATO LAW FIRM, P.C

16 By: /s/ Jenny L. Foley

By: /s/ Mario P. Lovato

17 JENNY L. FOLEY, Ph.D., ESQ.

MARIO P. LOVATO, ESQ.

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Attorneys for Defendant

Attorneys for Plaintiff

22 **ORDER**

23 IT IS SO ORDERED:

24
25 
26 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

27 DATED this 4th day of November, 2022. -

From: Arata, Mike <marata@hkm.com>
Sent: Thursday, November 3, 2022 1:27 PM
To: Mario Lovato <mpl@lovatolaw.com>
Subject: Re: Rashaud Blandburg v. Advanced Lighting and Electric, Inc. / Submission of Joint Pretrial Order

Thanks. We will provide a date certain based on 30 days and submit the stipulation.

Thanks again,
Mike Arata



Mike Arata
Attorney

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On Nov 3, 2022, at 1:24 PM, Mario Lovato <mpl@lovatolaw.com> wrote:

Mr. Arata,

Thirty days works better. Just be sure to include a date certain (i.e. December ____), rather than just stating 30 days.

Mario P. Lovato, Esq.
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7465 W. Lake Mead Blvd., Ste. 100
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TEL: 702-979-9047
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From: Arata, Mike <marata@hkm.com>
Sent: Thursday, November 3, 2022 1:20 PM
To: Mario Lovato <mpl@lovatolaw.com>
Subject: RE: Rashaud Blandburg v. Advanced Lighting and Electric, Inc. / Submission of Joint Pretrial Order

Thanks, Mr. Lovato. Given the delay and upcoming holidays, would your client be willing to stipulate to continue the submission of the JPTO 30 days instead of the original 14 we discussed?

Thanks-



Mike Arata
Attorney

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From: Mario Lovato <mpl@lovatolaw.com>
Sent: Thursday, November 3, 2022 12:49 PM
To: Arata, Mike <marata@hkm.com>
Subject: RE: Rashaud Blandburg v. Advanced Lighting and Electric, Inc. / Submission of Joint Pretrial Order

Mr. Arata,

I have been out-of-the-office for a few days. The revised stipulation looks fine. You can file with my electronic signature.

Thank you.

Mario P. Lovato, Esq.
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7465 W. Lake Mead Blvd., Ste. 100
Las Vegas, NV 89128
TEL: 702-979-9047
mpl@lovatolaw.com

From: Arata, Mike <marata@hkm.com>
Sent: Wednesday, November 2, 2022 9:38 AM
To: Mario Lovato <mpl@lovatolaw.com>
Cc: Foley, Jenny <JFoley@hkm.com>
Subject: RE: Rashaud Blandburg v. Advanced Lighting and Electric, Inc. / Submission of Joint Pretrial Order

Hi Mario:

Following up again on the revised stipulation. Are you ok if we send this version to the Court with your electronic signature?

Thanks,
Mike



Mike Arata
Attorney

702-674-9270
marata@hkm.com
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From: Arata, Mike

Sent: Tuesday, November 1, 2022 1:42 PM

To: Mario Lovato <mpl@lovatolaw.com>

Subject: RE: Rashaud Blandburg v. Advanced Lighting and Electric, Inc. / Submission of Joint Pretrial Order

Hi Mario:

Is this version ok to submit to the Court with your electronic signature?

Thanks,
Mike



Mike Arata
Attorney

702-674-9270
marata@hkm.com
www.hkm.com

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